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March 23, 2014

**Sent via ECF**

Honorable Faith S. Hochberg  
United States District Court  
U.S. Post Office & Court House Building  
Room 311  
P.O. Box 999  
Newark, N.J. 07101-0999

Re: U.S.A v. Joseph Wolfson, et al.  
Criminal No. 2:13-cr-748-FSH  
Our File No. 13,114

Dear Judge Hochberg:

We represent Defendants Joseph Wolfson, Richard Simon Trustee and Betty Simon, Trustee LLC in the above captioned matter. Respectfully, we do not consent to the Government's proposed protective Order.

The aforementioned defendants are also defendants in a parallel class action lawsuit filed in the District Court of New Jersey.<sup>1</sup> The Government's proposed Order, as currently worded, would greatly restrict their ability to properly represent themselves in that action. Further, a protective Order is unnecessary in this matter as the statute of limitations has expired. Thus, there is no risk of compromising an ongoing investigation by the Government.

Respectfully,  
JACOBS & BARBONE, P.A.

/s/ Michael F. Myers  
Michael F. Myers, Esquire  
Edwin J. Jacobs, Jr., Esquire

cc: All counsel  
cc: Joseph Wolfson

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<sup>1</sup> IN RE NEW JERSEY TAX SALES CERTIFICATES ANTITRUST LITIGATION, CIVIL DOCKET #: 3:12-cv-01893-MAS-TJB